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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 TINA BROVOLD,

11 Plaintiff,

12 vs.

13 SAFEWAY, INC.,

14 Defendant.

No. 3:20-cv-5792

NOTICE OF REMOVAL TO
FEDERAL COURT

15
16 Please take notice that Defendant Safeway Inc. hereby removes to the United
17 States District Court for the Western District of Washington the action described below.
18 On February 20, 2020, Defendant Safeway Inc. was served with a summons
19 (**Attachment 1**) and complaint (**Attachment 2**) in an action entitled *Tina Brovold v.*
20 *Safeway, Inc.*, Pierce County Superior Court No. 20-2-04955-2. The first date upon
21 which Safeway Inc. received a copy of this complaint was February 20, 2020.

22 The complaint does not specify the amount of damages being claimed by the
23 Plaintiff. Pursuant to RCW 4.28.360, Safeway propounded a request for a statement of
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NOTICE OF REMOVAL TO
FEDERAL COURT - 1

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Turner Kugler Law, PLLC

6523 California Ave SW #454
Seattle, WA 98136
(206) 659-0679

1 the damages Plaintiff is claiming in this matter. On August 4, 2020, Plaintiff served
2 Safeway with a statement of damages claiming more than \$75,000 in damages.

3 There is complete diversity because the Plaintiff is a citizen of the State of
4 Washington and Defendant Safeway Inc. is a corporation organized under the laws to
5 the State of Delaware with its principle place of business in the State of California.

6 This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a)
7 because it is between citizens of different states and the amount in controversy exceeds
8 \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C.
9 §1441 based on diversity jurisdiction.

10 A jury demand has been filed. (**Attachment 3**)

11 **INTRADISTRICT ASSIGNMENT**

12 The case arises out of an incident which occurred in Pierce County, Washington
13 and the case was originally commenced in Pierce County, Washington. In accordance
14 with LCR 3(e), this case should be assigned to a judge in the Tacoma Division.

15 A civil case cover sheet is attached as **Attachment 4**.

16 Dated: August 7, 2020.

17 TURNER KUGLER LAW, PLLC

18 By: s/ John T. Kugler
19 John T. Kugler, WSBA # 19960
Attorney for Defendant



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 7, 2020, I electronically filed the foregoing with the Clerk of the Court
3 using the CM/ECF system which will send notification of such filing to the following:

4 Attorneys for Plaintiff:
5 Richard S. Aguire
6 Kevin B. Page
7 Ritchie Reiersen, PLLC
8 110 2nd St. W., Ste. 135
9 Auburn, WA 98001
10 (253) 204-2244
11 richard@rrinjurylaw.com
12 kevin@rrinjurylaw.com

13 and I hereby certify that I have mailed by United States Postal Service the document to the following non-
14 CM/ECF participants:

15 none

16 s/ John T. Kugler
17 JOHN T. KUGLER, WSB #19960
18 Attorney for Defendant Safeway Inc.
19 TURNER KUGLER LAW, PLLC
20 6523 California Ave SW #454
21 Seattle, WA 98136-1833
22 Telephone: (206) 659-0679
23 E-mail: john@turnerkuglerlaw.com

24
25 NOTICE OF REMOVAL TO
FEDERAL COURT - 3

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